

Site	Herculaneum Road
ID #	MO 000000373
Break	20
Other	28-02

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Bob Holden Co. ernr Stephen M. Mahfood Director  
DIVISION OF ENVIRONMENTAL QUALITY  
P O Box 176 Jefferson City MO 65102 0176

February 8, 2002

Mr Art Spratlin  
Director  
Air, RCRA and Toxics Division  
Environmental Protection Agency  
Region VII  
901 N 5<sup>th</sup> Street  
Kansas City, KS 66101

Dear Mr Spratlin

In reviewing remediation activities at the Doe Run Herculaneum site, we have examined the lead concentrations in those yards that had been replaced over a period of years. These initial screening results indicate the rates at which these yards have become recontaminated is a serious concern. As part of this preliminary investigation, we have also looked at the dry deposition rates predicted by the air quality model used to demonstrate attainment as part of the State Implementation Plan (SIP) submittal. While this model is not intended to provide definitive deposition estimates, the preliminary results indicate that even after the SIP emission controls are implemented the deposition rates may not be acceptable.

The Department of Natural Resources is asking for EPA's assistance in studying this issue. Deposition will likely be a significant concern as we look toward managing the risk from this facility in the future. It is important to the health and safety of Herculaneum residents that lead deposition not create future problems, whether or not the facility is in compliance with the air emissions standard.

We understand the Environmental Protection Agency has begun resampling locations where soil has been remediated to determine if recontamination is occurring. This data will no doubt be valuable, but it may not be adequate to define deposition rates.

One concept we should explore is to establish soil test plots in various locations around Herculaneum, specifically near some of the air monitoring locations, to develop a relationship between deposition rates and ambient air concentrations. Test plots could also be established in areas of maximum predicted deposition. In situ analysis with the portable X-ray fluorescence unit might be used periodically to determine accumulated deposition if method sensitivity is adequate and repeatable.

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SUPERFUND RECORDS



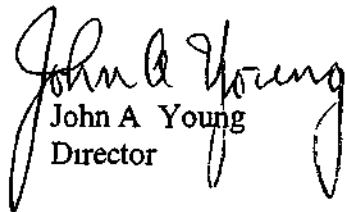
DIVISION

Mr Art Spratlin  
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This information will become critical as we continue to work through all issues associated with this facility and the impacts to the citizens. Please call me at (573) 751-0763, if you have any questions about this request. I want to sincerely thank you for your assistance with this difficult issue.

Sincerely,

AIR AND LAND PROTECTION DIVISION

A handwritten signature in cursive script, reading "John A. Young". The signature is written in dark ink and is positioned above the printed name and title.

John A. Young  
Director

JAY jrs